

From: Drylewski, Alexander C <Alexander.Drylewski@skadden.com>
Sent: Thursday, January 23, 2020 1:59 PM
To:
Cc: 'McGrath, Kevin'; 'Tenreiro, Jorge'; Musoff, Scott D; Malloy, Christopher P; Charmani, Thania
Subject: RE: SEC v. Telegram Group Inc. et al., 19 Civ. 9439 - Motion to Compel Documents

Dear Judge Castel,

At the request of the Clerk's office, we write to submit a joint request by the parties to permanently seal ECF No. 81-98, Exhibit 126 to the Declaration of Ladan F. Stewart in Support of Plaintiff's Motion for Summary Judgment, which was inadvertently filed without redactions to certain sensitive information, and has been temporarily sealed by the Clerk's office. Defendants also submit a request to permanently seal ECF No. 74-1, Exhibit 1 to the Declaration of Stephen B. McKeon in Support of Defendants' Motion for Summary Judgment, for the same reasons. Yesterday, Defendants filed replacement exhibits for both ECF No. 81-98 and ECF No. 74-1 (ECF Nos. 102-1 and 102-2, respectively) with redactions to sensitive information pursuant to the Court's January 13, 2020 Order (ECF No. 68).

We are available at the Court's convenience if there are any questions.

Respectfully submitted,

Alexander C. Drylewski
 Skadden, Arps, Slate, Meagher & Flom LLP
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From: Drylewski, Alexander C (NYC)
Sent: Friday, January 3, 2020 5:05 PM
To:

Cc: McGrath, Kevin <McGrathK@SEC.GOV>; 'Tenreiro, Jorge' <tenreiroj@SEC.GOV>; Musoff, Scott D (NYC) <Scott.Musoff@skadden.com>; Malloy, Christopher P (NYC) <Christopher.Malloy@skadden.com>
Subject: RE: [Ext] SEC v. Telegram Group Inc. et al., 19 Civ. 9439 - Motion to Compel Documents

Dear Judge Castel,

Attached are electronic courtesy copies of Defendants' Opposition to Plaintiff's Motion to Compel, which was filed on ECF this afternoon. Hard copies of these documents are being delivered to chambers shortly.

Please let us know if there are any issues opening the attachments.

Respectfully submitted,

Alexander C. Drylewski
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1. Please consult the undersigned's practices or communications with Chambers.
2. Please explain why under Lugosh these exhibits ought to be sealed. Application DENIED without prejudice.
SO ORDERED
[Signature]
USDJ
1-23-20

From: Tenreiro, Jorge <tenreiroj@SEC.GOV>
Sent: Friday, January 3, 2020 2:47 PM
To:
Cc: McGrath, Kevin <McGrathK@SEC.GOV>; Drylewski, Alexander C (NYC) <Alexander.Drylewski@skadden.com>; Charmani, Thania (NYC) <Thania.Charmani@skadden.com>
Subject: [Ext] SEC v. Telegram Group Inc. et al., 19 Civ. 9439 - Motion to Compel Documents

Dear Judge Castel:

As per the Court's instructions, attached are electronic courtesy copies of the SEC's Motion to Compel (D.E. 52) and Exhibits. This is the first of 3 emails.

Respectfully submitted,



Jorge G. Tenreiro | Senior Trial Counsel
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Further information about the firm, a list of the Partners and their professional qualifications will be provided upon request.

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